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REMARKS

In response to the Office Action mailed on March 18, 2009, Applicants respectfully request reconsideration. Claims 1, 7-9, 11, 13, 20-22, 28-30, and 51-83 are pending in this application. Claims 1, 4-13, 17-22, 25-31, and 51-71 are rejected. Claims 4-6, 10, 12, 17-19, 25-27, and 31 are canceled. Claims 1, 7-9, 11, 13, 20, 28, 51-57, 59-63, 66-70 are currently amended. Claims 72-83 are new. Based on amendments being submitted in this reply, claims 1, 11, 13, 72 and 78 are independent claims, and the remaining claims are dependent claims. Applicants believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

Claim Amendments

Claims 1, 7-9 and 51-57 have been amended to expedite prosecution of the present claims to allowance. The Office Action did not object to the subject matter claimed.

Claims 1, 7-9 and 51-57 now claim a “computer-implemented method in which a computer system initiates execution of software instructions stored in memory for editing a form calculation, the computer-implemented method comprising.” Applicants respectfully submit that claims 1, 7-9 and 51-57 are process claims, which is a statutory category of invention. Furthermore, claims 1, 7-9 and 51-57 are tied to a particular machine, which ensures that the claimed process is patent eligible under 35 U.S.C. § 101.

Rejections under 35 U.S.C. §103

Claims 1, 6-13, 19-22, 27-31, 51-53, 58-60, and 65-67 have been rejected under 35 U.S.C. §103 as being unpatentable over Dynamic Drive, “Drop down

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menu generator,” 03/30/1999, pp.1-2 (Dynamic Drive 1) and Dynamic Drive Screenshot “Drop down menu generator,” 03/30/1999, pp. 1 (Dynamic Drive 2) in view of W3C, HTML 4.01 Specification, Chapter 17, “Forms,” W3C, 12/24/1999, pp. 1-26 (W3C) and further in view of U.S. Patent Number 5,909,678 (Wasilewski). Claims 4-5, 17-18, 25-26, 55-57, 62-64, and 69-71 have been rejected under 35 U.S.C. §103 as being unpatentable over Dynamic Drive 1 and Dynamic Drive 2, in view of W3C, and further in view of U.S. 5,909,678 (Bergman). Claims 54, 61, and 68 have been rejected under 35 U.S.C. §103 as being unpatentable over Dynamic Drive 1 and Dynamic Drive 2, in view of W3C, in further in view of Wasilewski, and in further view of U.S. Patent Number 5,471,613 (Banning). Applicants respectfully traverse these rejections. Applicants note that claims 4-6, 10, 12, 17-19, 25-27, and 31 have been canceled, and so the rejection of these claims is moot.

According to 35 U.S.C. §103, for a patent to be granted, an invention needs to be non-obvious. An invention is non-obvious if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would not have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. As reiterated by the Supreme Court in KSR, the framework for the objective analysis for determining obviousness under 35 U.S.C. 103 is stated in *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966). Obviousness is a question of law based on underlying factual inquiries. The factual inquiries enunciated by the Court are: (A) Ascertaining the differences between the claimed invention and the prior art; and (B) Ascertaining the differences between the claimed invention and the prior art; and (C) Resolving the level of ordinary skill in the pertinent art.

A patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior

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art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does. This is so because inventions in most, if not all, instances rely upon building blocks long since uncovered, and claimed discoveries almost of necessity will be combinations of what, in some sense, is already known. KSR, 82 USPQ2d at 1396.

Applicants respectfully submit that the combination of elements in the claims is not found in the prior art.

Claim 1.

Amended claim 1 recites: “displaying a hyperlink for an element in the form calculation, the form calculation being a database query and the form calculation including a mathematical formula.” Instead of a simple database search query, claim 1 also applies a mathematical formula. For, example, finding the top 10% of items based on Direct Cost. Applicants respectfully submit that none of the cited prior art references discloses a hyperlink element in a form *calculation* that includes a *mathematical formula*. Therefore, the reference combination fails to teach or suggest all of the limitations of claim 1.

Amended claim 1 further recites: “upon completion of user interaction with the control and in response to receiving the selection, replacing the element with a new element, corresponding to the selection, displaying the hyperlink for the new element in the form calculation, and causing the presented control to disappear.” What happens in the process of claim 1 is that upon selecting a hyperlink, and selecting a new element in a list, the hyperlink itself changes to display the new element, without leaving a form calculation or web page.

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Applicants note the contrast between the known functionality of a hyperlink, and the functionality described in claim 1. With conventional functionality, clicking on a hyperlink (or otherwise selecting a hyperlink) causes a form or webpage to be redirected to a new webpage with different content. The Office Action notes that Dynamic Drive does not teach this limitation. The Office Action asserts that Wasilewski teaches drop down menus, but not in conjunction with hyperlinks. The drop down menus of Wasilewski are the conventional list of elements to select as variables. Applicants note that Wasilewski does not teach or suggest possible application of hyperlinks, or, more importantly, a modification to the functionality of hyperlinks. Applicants respectfully submit that although hyperlinks were known in the prior art, simply combining a knowledge of hyperlinks with references disclosing database queries is insufficient to teach claim 1. Such a combination is insufficient because claim 1 alters the conventional functionality of a hyperlink to yield a result that is unexpected from a hyperlink, namely, replacing one hyperlink element with a new hyperlink element instead of redirecting from a first page to another page. In other words, claim 1 changes **redirection** functionality to **replacement** functionality. Because such a modification teaches away from accepted functionality of hyperlinks, there is no motivation to combine the prior art references. Furthermore, such a combination would not produce the results that claim 1 yields.

Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. §103 be withdrawn.

Claims 11 and 13.

Claims 19 and 20 are independent claims that include similar amendments and patentable limitations as recited in claim 1. Applicants

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respectfully submit that claims 11, and 13 are patentable over the reference combination for the same rationale as set forth for claim 1.

Claims 7-9, 20-22, 28-30, and 51-71.

Claims 7-9, 20-22, 28-30, and 51-71 depend either directly, or indirectly, on one of claims 1, 11, and 13. Applicants respectfully submit that claims 7-9, 20-22, 28-30, and 51-71 are patentable over the reference combination at least by virtue of their dependency. Thus claims 7-9, 20-22, 28-30, and 51-71 are now in condition for allowance.

Newly Added Claims

Claims 72-83 are new. Claims 72 and 78 are independent claims. Claims 73-77 depend on claim 72, and claims 79-83 depend on claim 78. Independent claims 72 and 78 include similar limitations to those found in claim 1. Applicants respectfully submit that claims 72 and 78 are patentable for the rationale set forth above. Applicants respectfully submit that claims 73-77 and 79-83 are patentable at least by virtue of their dependency, and are now in condition for allowance. Applicants submit that claims 72-83 recite further patentable distinctions over the cited prior art.

Support for claims 72, 73, 78, and 79 is found in the limitations of claims 1, 4, 5, and 6, and is found in the specification on page 2, lines 3-6, page 1, lines 4-7, in Figure 3, as well as elsewhere in the figures and specification. Support for claims 74 and 80 is found in the specification on page 4, lines 4-6 and 12-15, and at page 2 lines 1-2, as well as elsewhere in the figures and specification. Support for claims 75 and 81 is found in the specification on page 3, lines 25-29, as well as elsewhere in the figures and specification. Support for claims 76, and 82 is found in the specification page 4, lines 1-3, as well as elsewhere in the

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figures and specification. Support for claims 77 and 83 is found in the specification at page 4, lines 22-24, as well as elsewhere in the figures and specification.

Summary

Applicant respectfully submits that the claims in the subject application are patentable over the cited prior art because the reference combinations fail to teach or disclose all of the features of the claimed invention. Thus, Applicants submit that the pending claims are in condition for allowance.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

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